

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Anna Melendez,

Plaintiff,

vs.

Globe Life And Accident Insurance Company,

Defendant.

CASE NO.:

NOTICE OF REMOVAL TO FEDERAL COURT

Globe Life And Accident Insurance Company (Defendant), through its attorney, Daniel L. Polsby of Clausen Miller, PC, files its notice of removal of this action from the Circuit Court Cook County to the United States District Court for the Northern District of Illinois, pursuant to 28 USC § 1446.

1. On May 15, 2018, Anna Melendez (Plaintiff) filed suit in the Circuit Court of Cook County.
2. The complaint counts for breach of contract and violation of the Illinois Insurance Code, 215 ILCS 5/1, *et seq.* (Complaint and summons are attached hereto as Exhibit 1)
3. Service of the complaint was effectuated upon the Illinois Department of Insurance (IDOI) on May 18, 2018, and the instant notice of removal was timely filed pursuant to 28 U.S.C. §§ 1446 (b), within 30 days thereafter. (Letter from IDOI confirming service on May 18, 2018, is attached as part of Exhibit 1)
4. Plaintiff is a citizen of the State of Illinois.
5. Defendant is a Nebraska corporation with its principal place of business in Texas.
6. Plaintiff's complaint seeks \$350,000 for breach of contract plus attorney fees and statutory penalties pursuant to 735 ILCS 5/155.

7. Plaintiff has invoked this Court's federal diversity jurisdiction by filing a lawsuit in state court against a corporate citizen of Texas and Nebraska seeking an amount in excess of \$75,000. 28 U.S.C.S. § 1332 (LexisNexis 2018).

8. Because Plaintiff filed this action in the Circuit Court of Cook County, venue is proper in the United States District Court for the Northern District of Illinois, Eastern Division, which is the district and division embracing the place where the action is pending.

9. Promptly after filing this Notice of Removal, Defendant will give written notice to Plaintiffs and will file a copy of the Notice with the Clerk of the Circuit Court of Cook County.

Defendant respectfully requests that the above described cause of action pending in the Circuit Court of Cook County be removed to the United States District Court for the Northern District of Illinois, and that this cause proceed in this Court as an action properly removed thereto.

Respectfully Submitted,

/s/Daniel L. Polsby

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